

BROWN & CONNERY, LLP

ATTORNEYS AT LAW
360 HADDON AVENUE
WESTMONT, NEW JERSEY 08108
(856) 854-8900
FAX (856) 858-4967

William F. Cook, Esq.
wcook@brownconnery.com

July 5, 2022

VIA ECF

The Honorable Juan R. Sanchez, U.S.D.J.
Chief Judge, Eastern District of Pennsylvania
601 Market Street, No. 17614
Philadelphia, PA 19106

Re: Ingram v. County of Camden, et al.
District of New Jersey Docket No. 14-cv-5519
Our File No. 14-0712

Dear Chief Judge Sanchez:

Please accept this letter on behalf of Defendants in reference to the status of this matter.

As Your Honor may recall, this case was settled on May 6, 2022. The Court subsequently granted Defendants' request dated June 2, 2022 (ECF No. 499) for the assistance of Judge Carlos as to certain issues relating to the completion of a Settlement Agreement.

Defendants respectfully submit that the finalization of a Settlement Agreement has progressed substantially with the intervention of Judge Carlos. Defendants are confident that this matter should be concluded in the near future with Her Honor's ongoing assistance.

On June 23, 2022, Plaintiff filed a Motion to Compel Settlement Enforcement (ECF No. 502). Under the District of New Jersey's Local Rules, a response to the motion would be due today, July 5th.

Given that this matter is progressing with Judge Carlos, Defendants would respectfully request that the above motion be stayed, or alternatively denied without prejudice, pending completion of the current process with Judge Carlos. In the event that this process is not successful, the briefing can be completed at that time. However, it is not productive at this time to expend resources on this motion, particularly where this matter is progressing towards the resolution of the final Settlement Agreement with Judge Carlos.

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Finally, to the extent that the Court is not inclined to defer the motion, Defendants would respectfully request until July 12, 2022 to respond to the motion. I was away on a family vacation from June 25th until yesterday, July 4th. Please note that I have had primary responsibility on behalf of the defense with respect to the completion of the proposed Settlement Agreement.

Thank you.

Respectfully submitted,

BROWN & CONNERY, LLP

/s/ William F. Cook

William F. Cook, Esquire

WFC/

cc: All Record Counsel (*via ECF*)
Honorable Pamela A. Carlos, U.S.M.J. (*via email*)